

**Plaintiff
Jackie Fisher's**

**Response in Opposition
to Defendants'**

**Motion for
Summary
Judgment**

EXHIBIT

15

Page 1 of 2

Fisher, Jacklyn L.

From: Fisher, Jacklyn L.
To: Watson, David W.
Cc: Fisher, Jacklyn L.
Subject: RE: Agency staff. (4)

Sent: Mon 3/27/2006 10:51 AM

Attachments:

I have given Bryan a contact person for the RMF. Can I give you a call. I've always made sure staffing is covered prior to my leaving. At this moment it is sufficient for my time away. Request (2) Agency staff. I will be meeting with Ms. MacCartney today and sending a follow-up email to both her and Mr. Aguilar. Ms. Wright will be notified if there is any major areas of concern.

-----Original Message----- (3)

From: Watson, David W.
Sent: Mon 3/27/2006 10:08 AM
To: Fisher, Jacklyn L.
Cc: Box, Denise K.
Subject: RE: Agency staff.

In an attempt to bring focus back to my original question....if Elite can not provide staff WHO is/are your point of contact person(s) for the RMF and Supplemental? I will expect that information before close of business today.

How many nurses have you requested to cover the RMF and is the coverage settled as best you can arrange it? Will it be sufficient for the needs of the RMF while you are away? Are there weak areas that need to be addressed? Are the ANMs both up to speed on the issues and concerns that you can anticipate while you are off for your two-weeks leave?

Have you met with or at least talked to Ms. Wright, who is covering in your absence, and given her some report as to the status and/or any expected problems or potential operational issues?

I will be expecting you to follow through with the needs for the agency staff today. If you cannot complete this I expect that you will brief your assistant Nurse Managers AND Ms. Wright as to what still needs to be accomplished before you leave today. I will expect an update to me covering the same concerns.

FISHER-100159

-----Original Message-----

From: Fisher, Jacklyn L. (2)

Sent: Mon 3/27/2006 9:37 AM

To: Watson, David W.

Cc: Fisher, Jacklyn L.

Subject: RE: Agency staff.

I've spoke with Bryan and HR, Ms. Cuttsinger has to go through clearance again and is still pending. I've requested Ms. Ferguson and as Friday he was unable to speak with her. He will call me back today with an update. Elite didn't have any Nurses available. If I could accept the transfers from Wynne this would eliminate my need for Agency staff and most of the overtime. As discussed early on, your concern is budget and staffing issues for Wy/Holliday/Byrd.

-----Original Message----- (1)

From: Watson, David W.

Sent: Fri 3/24/2006 12:19 PM

To: Fisher, Jacklyn L.

Cc:

Subject: Agency staff.

Please provide me with an update on what the agency staffing situation is. Can Elite provide nurses? If not who is your point of contact person(s) for the RMF and what is available from Supplemental Staffing.

Also I spoke again with Bryan Allison from Supplemental Staffing. He informed me that he has followed-up with Ms. Cutsinger regarding the car problems. He has assured me that won't be an issue.

Please have this information to me by close of business on Monday 3-27-06.

Thanks

David

<https://webmail.utmb.edu/exchange/jlfisher/Delet...:%20Agency%20staff.-3.EML?Cmd=open> 3/27/2006

FISHER-100160